

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

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MICHELE DALY,

*Plaintiff,*

**NOTICE OF MOTION**

-against-

18-CV-0845

NEW YORK STATE POLICE, MAJOR PHILIP T.  
RAUGEUX, COMMANDER MARK L. LINCOLN, ET AL

(TJM/TWD)

*Defendants.*

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PLEASE TAKE NOTICE that upon the annexed affidavit of Christopher Liberati-Conant; the Complaint; the accompanying memorandum of law; and upon all prior proceedings, Defendants Philip T. Rougeux, Mark L. Lincoln, Andrew Campbell, Shane W. Woods, and the New York State Police, on November 23, 2018, at 9:30 a.m., or as soon thereafter as counsel can be heard, will make a motion at the United States District Court, Northern District of New York, Broome County, New York, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, for an order dismissing the complaint, together with such other or further relief as may be just.

Dated: Albany, New York  
October 22, 2018

BARBARA D. UNDERWOOD  
Attorney General of the State of New York  
Attorney for Defendants, Andrew Campbell, Philip  
T. Rougeux, Mark. L. Lincoln, Shane W.  
Woods and the New York State Police  
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Albany, New York 12224

By: s/ Christopher Liberati-Conant  
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